

# **EXHIBIT G**

Affidavit of Peter T. Paladino, Jr.

### AFFIDAVIT

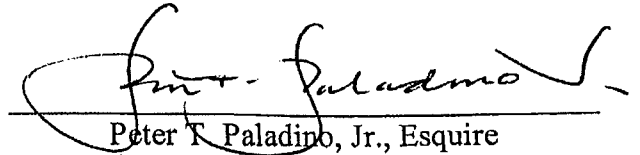
My name is Peter T. Paladino, Jr. I am a licensed attorney in the states of Pennsylvania, Michigan, and New York. Prior to my retirement, I served on the Executive Committee (2007 to 2014) and as the President (2010 to 2014) of Goldberg, Persky, and White, P.C. ("GPW"). Since 1983, GPW's main area of practice has been the representation of victims of asbestos-related disease resulting from their occupational exposure to asbestos. I am providing this affidavit to support a petition for an award of Common Benefit funds from the NFL Concussion litigation settlement to Goldberg, Persky, and White, P.C.

In 2000, GPW hired Jason E. Luckasevic as an associate attorney in its Pittsburgh office. Jason began representing our clients at depositions, conducting discovery, and arguing motions for summary judgment and quickly took on a role managing a caseload that involved him taking responsibility for the litigation of cases from inquiry through discovery to trial or eventual resolution.

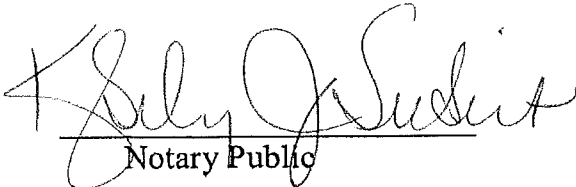
In approximately 2007, Jason approached the GPW shareholders with his idea of a lawsuit against the NFL on behalf of retired football players for long-term injuries sustained after years of repeated sub-concussive and concussive head trauma. Jason presented the shareholders with a comprehensive understanding of the medical literature regarding brain injuries associated with football, as well as his legal analysis for the basis for causes of action against the NFL. Understanding the breadth of resources and pervasive influence of the NFL, we anticipated that any legal action against the NFL with such potential wide-ranging consequences would be vigorously defended and very costly in terms of money and manpower. While we encouraged his inquiries and continued study of a potential area of litigation, we explained that our firm would not be willing to take the financial risk and expend the significant personnel resources such an undertaking would require. After that meeting Jason began to seek out firms with which to associate on potential litigation in order to consolidate resources, but without immediate success due to similar concerns of other firms.

In April 2010, Jason (who had been elevated to shareholder status as of January 1, 2009) updated the firm's Executive Committee with the developments that had taken place since he first began researching and pursuing his ideas about a lawsuit against the NFL, including his speaking engagement on the medical and legal issues related to repetitive head trauma in football at a retired players' seminar in Las Vegas, NV. At this time the Executive Committee agreed to assign another attorney to assist Jason in his efforts to develop a viable case against the NFL. Indeed, Jason ultimately secured litigation partners by cultivating associations with Russomanno & Borrello and Tom Girardi, and on July 19, 2011, the Complaint in *Maxwell v. NFL* was filed in Los Angeles County Superior Court, California -- the first case against the NFL seeking damages for injuries sustained by retired football players resulting from years of sub-concussive and concussive head trauma.

Jason's commitment to researching and understanding the facts surrounding the medicine, the players, and the NFL in order to develop the legal theories that resulted in the NFL Concussion litigation ultimately resulted in a significant shifting of firm resources, including hiring of new personnel, to accommodate and encourage Jason's pursuit and development of a new area of litigation. In dedicating himself to this objective, Jason risked both his reputation and the trajectory of his income, eventually choosing to step away from the firm's lucrative asbestos practice in order to spend the majority of his time developing the case against the NFL. Without the dedication of Jason and GPW there would be no NFL Concussion litigation and no Common Benefit fund. I believe that the facts as set forth above and in Jason Luckasevic's affidavit amply support an award of Common Benefit funds from the NFL Concussion litigation settlement.

  
Peter T. Paladino, Jr., Esquire

Sworn to and subscribed before me  
this 30 of August, 2016

  
Notary Public

